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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

United States of America,

Plaintiff,

v.

CB SURETY, LLC, et al.,

Defendants.

Civil Case No. 2:23-cv-02812-TLN-DB

NOTICE OF MOTION AND MOTION TO
ADD RECEIVERSHIP ENTITIES

Date: June 27, 2024

Time: 2:00 p.m.

Courtroom: 2, 15th Floor

Judge: Hon. Troy L. Nunley

PLEASE TAKE NOTICE that on June 27, 2024, at 2:00 pm, or as soon thereafter as may
be heard, Plaintiff the United States of America will, and hereby does, move to endorse the
Receiver's request that the Court add two additional entities to the Receivership, impose an asset

1 freeze over their accounts, and grant the Receiver exclusive control of those accounts. This
2 motion will be made in Courtroom 2 of the United States Courthouse located at 501 I Street in
3 Sacramento, California.

4 The Receiver's requests are warranted because the Receiver has uncovered clear
5 evidence that two additional entities—Won It All, Inc., and Run It Up, Inc.—are controlled by
6 Defendants and have been used by Defendants to further Defendants' alleged scheme, including
7 by controlling the scheme's ill-gotten gains and compensating individuals involved in furthering
8 the scheme. Accordingly, these additional entities fall within the contours of the Receivership
9 already authorized by this Court. *See* ECF No. 31 at 4-7.

11 This Motion will be based on this Notice of Motion and Motion, the Interim Status
12 Reports filed by the Receiver in this action (ECF Nos. 67-1 and 72-1), and all pleadings, records,
13 and other documents on file with the Court in this action, and on any other evidence as may be
14 presented at the hearing of this matter.

17 Dated: May 16, 2024

Respectfully submitted,

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Principal Deputy Assistant Attorney General

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26 */s/ Francisco L. Unger*
27 FRANCISCO L. UNGER

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CERTIFICATE OF SERVICE

I certify that on May 16, 2024, a copy of the forgoing Notice of Motion was served on the parties by the following methods:

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